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February 20, 2008

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## VIA HAND AND ELECTRONICALLY

The Honorable Douglas P. Woodlock  
 UNITED STATES DISTRICT COURT FOR  
 THE DISTRICT OF MASSACHUSETTS  
 John Joseph Moakley U.S. Courthouse, Suite 4110  
 One Courthouse Way  
 Boston, Massachusetts 02210

Re: *John Hancock Life Insurance Company, et al. v. Abbott Laboratories, U.S.D.C. (Mass.) Civil Action No. 05-11150-DPW*

Dear Judge Woodlock:

I write on behalf of my client, Abbott Laboratories, with regard to the deposition designations electronically filed by Abbott on February 18, 2008, in the above-referenced matter. We have discovered yesterday and today, with input from counsel for John Hancock, certain inadvertent errors in these designations. These errors were caused partly by technical problems with our firm's Live Note system, and partly by simple human error. We are working very hard to identify all errors in the designations filed on February 18 and to correct them as soon as possible. On a rolling basis, Abbott will be submitting electronically to the Court corrected versions of any designations that require correction. In addition, Abbott will provide to the Court a complete courtesy hard copy of the corrected designations as soon as possible.

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Because of the inadvertent errors referenced above, John Hancock believes that Abbott has not correctly identified the evidence that John Hancock designated and submitted to the Court on January 28, 2008. Accordingly, John Hancock requests that the Court not rely on Abbott's deposition designation submissions of February 18 as an accurate description of John Hancock's evidence.

We apologize for any confusion that this problem may have caused.

Sincerely,



Gregory D. Phillips

GDP:cj

cc: Brian A. Davis, Esq.  
Joseph H. Zwicker, Esq.  
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